

Exhibit 20I



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IN THE SUPERIOR COURT
OF THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLA

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JOAQUIN Q. ATALIG,)
)
Plaintiff,)
)
vs.) CIVIL ACTION NO. 06-0119 (R)
)
OKP (CNMI) CORPORATION, ET AL,)
)
Defendants.)
_____)

CONFIDENTIAL

DEPOSITION OF LUDIVINA P. CARILLO

VOLUME 1

Date: WEDNESDAY, JUNE 27, 2007
Location: LAW OFFICE OF STEPHEN J. NUTTING
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Saipan, MP
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FOR PLAINTIFF: MR. RAMON QUICHOCO
 -AND MR. MICHAEL DOTTS
 FOR DEFENDANT: MR. STEPHEN NUTTING
 -AND MS. MAYA KARA
 FOR DEFENDANT: LILLIAN TENORIO
 DEPONENT: LUDIVINA P. CARILLO
 NOTARY PUBLIC: PAULINE BERGER
 ALSO PRESENT: DAN WESTPHAL, VIDEOGRAPHER

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INSTRUCTION NOT TO ANSWER: (None)

1 December?

2 A I don't remember.

3 Q Do you remember if it was before or after
4 Christmas?

5 A I'm not sure.

6 Q Okay. Was the heavy equipment there already
7 when Reddy came to talk to you about that?

8 A Yes.

9 Q It was already there?

10 A Yes.

11 Q Okay. And I think in your deposition you said
12 something about that came in about December 19, when
13 heavy equipment came; is that about right? (Inaudible.)

14 A That the OKP came in. The two.

15 Q Okay. All right. Okay. So the heavy
16 equipment came and so Reddy came to talk to you about
17 clearing the property and wanted to know where the
18 boundaries were?

19 A He just asked me.

20 Q All right. And why did Reddy come to you? Do
21 you know why he came to ask you about it?

22 A I don't know.

23 Q Okay. Did anyone else from OKP come and ask
24 you about where they could clear, where they couldn't
25 clear?

1 A Only Reddy.

2 Q Only Reddy. So you didn't talk to anybody
3 else about it?

4 A No.

5 Q How about Allen Yee, did you talk to him about
6 it?

7 A No.

8 Q Now, when Reddy came to ask you about where he
9 could clear, what happened after that? Where you able
10 to tell him?

11 A Excuse me, sir, what's your question?

12 Q Okay. You said Reddy came -- or Reedy or
13 Reddy?

14 UNIDENTIFIED SPEAKER: Reddy.

15 BY MR. NUTTING:

16 Q Is it Reddy? Okay. Reddy came to talk to you
17 about where he could clear. And why did they want to
18 clear in the first place?

19 A The area where they're going to put the
20 equipment.

21 Q Okay. So they needed to clear an area. And
22 where was this area -- where did they want to -- what
23 area did OKP want to clear?

24 A I don't know.

25 Q You have no idea?

1 A I don't know.

2 Q Okay. But they came to you, or Reddy came to
3 you and asked you, "Where can we clear?" Is that fair?
4 Is that about what happened?

5 A No. He asked me where is the boundary --
6 boundary and which area that they can clear and which
7 area that they can not touch.

8 Q Okay. So he wanted to know three things:
9 Where is the boundary, where can we clear and where am I
10 not supposed to clear.

11 A Yes.

12 Q Okay. And the only person you talked about
13 that was Reedy -- Reddy.

14 A Yes.

15 Q Okay. And did you know where the boundaries
16 of the property were?

17 A Yes.

18 Q And how did you know where the boundaries
19 were?

20 A Mr. Atalig is telling me where is the place
21 that they don't have to touch.

22 Q Okay.

23 A And where is the place that they can clear.

24 Q Okay. So when you say Mr. Atalig was telling
25 you about the places they could clear and where they

1 couldn't clear, you're talking about Jack Atalig?

2 A Yes, Sir.

3 Q Okay. The plaintiff in this case, Joaquin?

4 A Yes, Sir.

5 Q All right. So Joaquin has explained to you
6 about where they could clear and where they couldn't
7 clear?

8 A He just tell me on that area, the pig house
9 that we are fencing, let them not to touch that area.

10 Q Okay.

11 A They can use all the property all the way to
12 the back up to the pandanus.

13 Q Okay. Let's go back and look at Exhibit D
14 again. And if you would, can you -- I know you went
15 through with it and I had some difficulty from your
16 deposition being able to tell exactly where you told
17 Reddy he could clear. You said something about being
18 able to clear all the way from the first gate; is that
19 right?

20 You have said something on page 27, you could
21 clear all the way from the entrance gate all the way to
22 the cow station. What the heck is that?

23 A I don't know where is -- there's no mark here
24 on the --

25 Q There's the hotel.

1 A -- first entrance. The first entrance is not
2 here.

3 Q Okay. This appears to be a small map in the
4 corner here. It shows all of the Atalig -- or all of
5 the Joaquin Atalig's property in the roadway, and this
6 is the area that they cleared. That's why the square is
7 here. As for the hotel, as I understand it, would be
8 running along the roadway right through there; right?

9 A Yes.

10 Q Okay. So on that, where would the entrance
11 be?

12 (Tape change.)

13 MR. NUTTING: We are on Side B of Tape 3 in
14 the continuing deposition of Ludivina Carillo.

15 BY MR. NUTTING:

16 Q So you said something about being able to go
17 from the entrance gate all the way to the cow station.
18 If this is where the hotel is on the property -- maybe
19 you can draw that in to show it's there.

20 If this is where the hotel is, where is the
21 entrance gate and the cow station that you're talking
22 about?

23 And you can probably do it on the zoom if you
24 want.

25 A The first entrance, sir, is here.

1 Q Where?

2 A In this area.

3 Q All right. Right on the edge of
4 Mr. Atalig's -- Mr. Antonio Atalig's property; is that
5 correct?

6 A This is the property of Atalig?

7 Q That's Joaquin Atalig; this is Antonio Atalig
8 here, as I understand it.

9 A So the first entrance is here.

10 Q Okay. I saw in your deposition, you talked
11 about all the way from Antonio Atalig's property until
12 the cow station.

13 Where is the cow station?

14 A The cow station is back here.

15 Q Okay. It says on page 34 of your deposition,
16 I told him -- I'm showing from the cow station all the
17 way to the area, this is the boundary of Antonio Atalig
18 property. So this is where you told him he could clear,
19 from the cow station all the way to Tony -- to Antonio
20 Atalig's property?

21 A Yes. Except the one I showed him not to --

22 Q Except for that one.

23 A -- not to touch.

24 Q Right. Okay. And so why don't you just draw
25 that -- can you show me where the cow station is?

1 areas where the water tank and the latte stone is. I
2 know that you on several, several, several times, you
3 mentioned that you did specifically warned him not to
4 clear where the other tanks were. Not to touch.

5 Yes, not to touch. Not to touch that area.

6 So that's the same area that you told him not
7 to touch, "A"; correct?

8 A The "A," sir, yes.

9 Q Back on page 32 Mr. Quichocho asked you, After
10 you told Reddy not to touch that area where you were
11 standing -- I guess, at the time -- you cannot touch
12 that area, and you said, Okay.

13 What? Did you discuss anymore about that?

14 And you said, No. I'm telling him that if
15 they're going to clear the place, they should aggregate
16 the soil or the grass and the rocks. You can throw the
17 soil or the grass in the big pandanus tree that's
18 already dead.

19 Is that that pandanus that we have drawn
20 there? Is that where you want him to throw the --

21 A Yes.

22 Q Okay. But you made very clear to him that he
23 wasn't supposed to touch that A area?

24 A Yes, sir.

25 Q Did you ever tell Reddy that he should not to

1 touch the latte stones in that area, or did you just
2 tell him not to touch that area?

3 A This is very important.

4 Q Okay. All right. But did you take Reddy over
5 and show him the latte stones?

6 A No. I'm standing in the walkway going in.

7 Q Okay. The walkway of going into what?

8 A To the water tank.

9 Q All right. And so you were standing in the
10 walkway going in and you had your arms spread?

11 A This.

12 Q Uh-huh. And then you --

13 A This is fence.

14 Q Okay. That was the net you were talking
15 about?

16 A Yes. This is fence.

17 Q Uh-huh. And you told him, Don't touch this
18 area?

19 A Yes.

20 Q Now, my question: Did you take him in there
21 and show him that there are latte stones in there?

22 A I did not show him, but, "Don't touch this,
23 this is very important. This is fence off."

24 Q All right. In your -- when -- when did they
25 start clearing; do you remember?

1 sudden you remember in December having this discussion
2 with Jackie? Are you just making this up as we go
3 along?

4 UNIDENTIFIED SPEAKER: Objection.

5 THE WITNESS: No.

6 BY MR. NUTTING:

7 Q Okay. All right. In this map that we marked
8 Exhibit F, can you tell me where the taro patch is?

9 A (Inaudible.)

10 Q Okay. In your deposition you don't say
11 anything about telling Reddy not to go into the taro
12 patch.

13 UNIDENTIFIED SPEAKER: Didn't we go over this
14 yesterday thoroughly?

15 MR. NUTTING: Not quite.

16 UNIDENTIFIED SPEAKER: Not thoroughly?

17 MR. NUTTING: No.

18 THE WITNESS: Excuse me, sir, what's your
19 question?

20 BY MR. NUTTING:

21 Q My question is, did you tell Reddy not to go
22 into the taro patch?

23 A No.

24 Q Okay. Why not? Did Jack just tell you, "Tell
25 them not to go into the water tank area"? I guess my

CERTIFICATE TRANSCRIPTION

I, SHELLY A. SCOTT, CSR License No. 12005, State of California, certify that the foregoing deposition was transcribed by the use of computer-aided transcription under my direction;

That the foregoing deposition is a true record of the testimony of the witness and of all objections made at the time of the examination as contained in the audio files provided to me;

That I am not of counsel or attorney for any of the parties in the above entitled matter, nor a relative or employee of such attorney our counsel, nor am I fiancially interested in the outcome of said matter;

That the deponent will be notified to review and sign the foregoing deposition by the attorneys for the plaintiff.

Witness my hand this 24th day of August, 2007.

____(Electronically transmitted - S.A.S.)____

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RE: Atalig v. OKP 06-0119
Defendant Deposition Transcripts

Received from the Law Firm of Mailman & Kara, LLC the following document/s:

1. ATALIG, FELIPE Q. --- ONE (1) CD [audio files], hard copies of EXHIBITS A to G
2. ATALIG, WILLIAM T. --- ONE (1) DVD, [audio files], hard copies of EXHIBITS A to E
3. BUSSELL, JACQUELINE S., VOLS 1-3, --- ONE (1) DVD, [audio files], hard copies of EXHIBITS A to S
4. CARILLO, LUDIVINA "EDITA" P., VOLS 1-2 --- ONE (1) DVD, [audio files], hard copies of EXHIBITS A to P
5. HOCOG, PATERNO "LARRY" B. DR., VOLS 1-2 --- ONE (1) DVD, [audio files], hard copies of EXHIBITS A to G
6. ONE (1) CD [eTranscripts for all of the above]

Dated: August __29__, 2007.

Place/Time: 10:40am

MELISSA CAMACHO
Print/Sign Name